

WWR# 040996775

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	
RLI Solutions Company	)	Bankruptcy No. 22-21375-GLT
Debtor,	)	
	)	Chapter 11
Ford Motor Credit Company LLC,	)	
Movant,	)	
	)	
v.	)	
	)	
RLI Solutions Company Debtor,	)	
Respondent.	)	

**MOTION FOR RELIEF FROM AUTOMATIC STAY  
AND WAIVER OF 14-DAY STAY UNDER FED. BANKR. RULE 4001(a)(3)**

Now comes, Ford Motor Credit Company LLC by and through counsel, Garry Masterson and Weltman, Weinberg & Reis, Co., L.P.A. and states the following:

1. That this action is commenced pursuant to 11 U.S.C. §§ 361, 362, 363, 365 and other sections of Title 11 of the United States Code.
2. That the Debtor filed their voluntary petition under Chapter 11 of the Bankruptcy code on 07/17/2022.
3. That on or about 02/21/2022, the Debtor entered into a certain Lease with the Movant Ford Motor Credit Company LLC. A copy of the Lease is attached hereto as Exhibit "A" and incorporated herein by reference.
4. That the debtor is in default of payments due under the Lease and that there is presently due and owing the amount of \$43,850.80 plus the residual amount of \$8,177.20 for a total of \$52,028.00. There are currently arrears in the amount of \$3,132.20 for the months of 08/08/2022 through 11/08/2022. The last payment received was on or about 07/01/2022.
5. That the Movant believes that the Debtor lacks the ability to timely perform all of his obligations under the Lease and that the Debtor is unable to cure the default, provide assurances that it will promptly cure said default or provide adequate assurances of future performances under the lease.
6. Debtor has not yet filed a proposed Plan in this case as of the date of this Motion.
7. That the Movant is entitled to relief from stay to recover possession of its leased vehicle, a 2022 Ford Ranger VIN# 1FTER4FH2NLD17395. A copy of the title of the aforementioned vehicle showing Ford Motor Credit Company LLC as the owner of said vehicle attached hereto and incorporated herein as Exhibit "B".

WHEREFORE, Movant prays for an Order from this Court:

1. granting Movant relief from stay to take possession of its leased vehicle referenced herein;  
and

2. waiving the 14-day stay provided for in Fed. Bankr. Rule 4001(a)(3); and
3. for such further relief as equity and/or law entitles Movant to receive.

/s/ Garry Masterson

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